

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

In re:

LTL MANAGEMENT LLC,

Plaintiff,

v.

THOSE PARTIES LISTED ON APPENDIX A TO
COMPLAINT and JOHN AND JANE DOES 1-1000,

Defendants.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Adv. No. 23-01092 (MBK)

Hearing Date and Time:

June 27, 2023 at 10:00 a.m.

DEBTOR'S OMNIBUS OBJECTION TO MOTIONS TO DISMISS

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

LTL Management LLC (the “Debtor”), the debtor in the above-captioned chapter 11 case (the “Chapter 11 Case”) and plaintiff in the above-captioned adversary proceeding (the “Adversary Proceeding”), objects to the motions to dismiss filed by the Estate of Melissa Fleming [Adv. Dkt. 117] and Robert Gendelman as Executor of the Estate of Sherri Gendelman [Adv. Dkt. 118] (together, the “Motions to Dismiss”).

Although the Motions to Dismiss were filed in the Adversary Proceeding, both motions adopt the arguments asserted in the motion to dismiss the Chapter 11 Case [Dkt. 286] filed by the Official Committee of Talc Claimants. See Adv. Dkt. 117-2 (“incorporate all arguments contained in the Motion of the Official Committee of Talc Claims to Dismiss the Second Bankruptcy Petition of LTL Management, LLC thereon through the same were set forth herein at length”); Adv. Dkt. 118-2 (same). Indeed, in the proposed orders submitted with the Motions to Dismiss, the movants request that the Court order that “Case No. 23.12825 (MBK) [i.e., the Chapter 11 Case, not this Adversary Proceeding] is **DISMISSED.**” See Adv. Dkts. 117-1, 118-1 (emphasis in original).

The Debtor believes the Motions to Dismiss were incorrectly filed in the Adversary Proceeding, and the Debtor opposes the relief requested in the Motions to Dismiss for all of the reasons set forth in the *Debtor’s Omnibus Objection to Motions to Dismiss Chapter 11 Case* [Dkt. 614], filed contemporaneously herewith in the Chapter 11 Case. The Motions to Dismiss should be denied.

Dated: May 26, 2023

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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